

**SUMMONS IN A CIVIL ACTION COURT OF COMMON PLEAS, CUYAHOGA COUNTY JUSTICE CENTER
CLEVELAND, OHIO 44113**CASE NO.
CV13817459

D1 CM

SUMMONS NO.
22334071

Rule 4 (B) Ohio

FD

Rules of Civil
Procedure

DEC 09 2013

CHRISTIAN CINCU
VS

PLAINTIFF

TOYOTA MOTOR CREDIT CORPORATION, ET AL DEFENDANT

SUMMONS

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RECEIVED DEPT.

TOYOTA MOTOR CREDIT CORPORATION
LEGAL DEPARTMENT
19001 S. WESTERN AVE.
TORRANCE CA 90509-0000You have been named defendant in a complaint
(copy attached hereto) filed in Cuyahoga County
Court of Common Pleas, Cuyahoga County Justice
Center, Cleveland, Ohio 44113, by the plaintiff
named herein.

Said answer is required to be served on:



Plaintiff's Attorney (Pro Se)

CHRISTIAN CINCU
10801 FLORIAN AVE
CLEVELAND, OH 44111-0000You are hereby summoned and required to
answer the complaint within 28 days after service
of this summons upon you, exclusive of the day of
service.Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

Case has been assigned to Judge:

KATHLEEN ANN SUTULA

Do not contact judge. Judge's name is given for
attorney's reference only.ANDREA F. ROCCO
Clerk of the Court of Common PleasDATE
Nov 25, 2013

By _____ Deputy



COMPLAINT FILED 11/20/2013



Plaintiff:

Christian Cincu
10801 Florian Ave
Cleveland, OH 44111

Date: 11/20/13

Defendants:

Judge: KATHLEEN ANN SUTULA

CV 13 817459

Toyota Motor Credit Corporation
Legal Department
19001 S. Western Ave.
Torrance, CA 90509

Amount: 25,000.00

Michael R. Groff
19001 S. Western Ave.
Torrance, CA 90509

Plaintiff Christian Cincu brings forth the following causes of action and alleges the following:

1. Plaintiff is an individual and resident of Cleveland, OH.
2. Plaintiff is suing Toyota Motor Credit for failure to correct credit history after several notices.
3. Plaintiff cosigned for St. Anthony Romanian Orthodox Monastery for a 2004 Volkswagen Passat. At the dealer, the Plaintiff asked how the credit is approved; and at that time it was stated that the credit is approved based on the business information and its owner first and that a cosigned is just to help get a better rate. It was also stated that credit approval is definitely not based solely on the cosigned.
4. The Plaintiff is suing Toyota Motor Credit for failure to protect the customer and failure to disclose the credit process accurately. Toyota Motor Credit did not search the owner of St. Anthony Romanian Orthodox Monastery to check the credit and find out that Sava Cosas had bankruptcy and a foreclosure on his file within the recent years. Therefore, credit was based solely on the cosigner credit which is not in accordance to the Fair Credit Reporting Act.
5. Toyota Motor Credit has reported inaccurate information. The car was paid off in October of 2012. The account was reported failure to pay in December of 2012 and in January of 2013. Toyota Motor Credit was contacted to remove the inaccurate information and they replied by saying that it was investigated and it is accurate. However, copy of the title was sent to the Plaintiff on November 1, 2013, which definitely shows that the car was paid before then.

6. Toyota Motor Credit failed to report the information on the business credit for St Anthony Romanian Orthodox Monastery. Considering, that the Plaintiff paid for the car in full, it is wrong that St. Anthony Romanian Orthodox Monastery has a clean record since it failed to pay for the car and it became the cosigner's responsibility. Cosigner was supposed only to pay for the car not be affected credit score wise.

7. Due to this situation, Plaintiff credit score was greatly affected and is unable to purchase house in Dallas, TX for relocation. Plaintiff is requesting immediate removal of the account from all 3 credit bureaus and \$25,000 in damages to help cover for rental expenses and higher interest and downpayment requested by banks in order to CONSIDER for the loan. Based on current situation the bank did not approve \$200,000 with 20% down payment due to the damaged credit report score.

Sincerely,



Christian Cincu

ANDREA F. ROCCO
CLERK OF COURTS
1200 ONTARIO STREET
CLEVELAND OH, 44113-0000

CERTIFIED MAIL



719 Page 4722 2334 0711

RETURN RECEIPT REQUESTED

SHOWING TO WHOM, DATE AND ADDRESS WHERE DELIVERED



TOYOTA MOTOR CREDIT CORPORATION
LEGAL DEPARTMENT
19001 S. WESTERN AVE.
TORRANCE CA 90509-0000



Tracking No:
SOX0000000000000000
CUSTOMER DETAILS

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CLEVELAND, OHIO 44113

CASE NO.
CV13817459

D2 CM

SUMMONS NO.
22334072

Rule 4 (B) Ohio

Rules of Civil
Procedure

CHRISTIAN CINCU
VS
TOYOTA MOTOR CREDIT CORPORATION, ET AL

PLAINTIFF

DEFENDANT

SUMMONS

MICHAEL R. GROFF
19001 S. WESTERN AVE.
TORRANCE CA 90509-0000

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Plaintiff's Attorney (Pro Se)

CHRISTIAN CINCU
10801 FLORIAN AVE
CLEVELAND, OH 44111-0000

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ANDREA F. ROCCO
Clerk of the Court of Common Pleas

DATE
Nov 25, 2013

By MW

Deputy



COMPLAINT FILED 11/20/2013

